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8	Attorneys for Defendant BLACKBERRY CORPORATION			
9	UNITED STATES DISTRICT COURT			
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
11	NEELAM SANDHU, an individual,	Case No. 3:24-cv-02	2002-SK	
12	Plaintiff,	DECLARATION OF LAUREN N. BECK REGARDING CORRECTIONS TO DKT. NO. 112		
13	vs.			
14	BLACKBERRY CORPORATION, a	Judge:	Hon. Sallie Kim	
15	Delaware Corporation,	Judge.	Hon. Same Kim	
16	Defendant.			
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DECLARATION OF LAUREN BECK REGARDING CORRECTIONS TO DKT. NO. 112

Case No. 3:24-cv-02002-SK

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I, Lauren N. Beck, hereby declare:

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(Dkt. No. 111).

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1. I am admitted to practice law in the State of California and before this Court. I am an attorney at Munger, Tolles & Olson LLP, and represent Defendant BlackBerry Corporation ("BlackBerry") in this action. I submit this declaration regarding exhibits filed at Dkt. No. 111 in this litigation. The contents of this declaration are based on my personal knowledge, including my

2. On December 10, 2025, BlackBerry submitted a Motion for Summary Judgment

personal knowledge and, if called as a witness, I could and would competently testify to them.

personal knowledge of the documents cited herein. The facts set forth herein are within my

- 3. On December 11, 2025 at approximately 2:01 a.m., Defendant BlackBerry Corporation submitted an Administrative Motion to Seal Materials Submitted in Connection with BlackBerry's Motion for Summary Judgment (Dkt. No. 112).
- 4. At approximately 2:09 a.m. on December 11, 2025, I served to Plaintiff Neelam Sandhu's counsel a copy of BlackBerry's Administrative Motion to Seal and all supporting materials referenced in that motion, including a copy of the under-seal version of the Motion for Summary Judgment and all exhibits BlackBerry intended to file under seal (Exhibits 1-3, 5, 8-11, 13-15, 19-21, 25-27, 29-31, 33-35, 38, 40-41, 44-49 to the Declaration of Lauren Beck).
- 5. Later on December 11, 2025, BlackBerry discovered that Dkt. No. 112 had inadvertently omitted two items referenced in the Administrative Motion to Seal (Dkt. No. 112) the under-seal version of the Motion for Summary Judgment, and the under-seal version of Exhibit 29 submitted in support of the motion. BlackBerry filed both items at Dkt. No. 113. The versions of the under-seal Motion for Summary Judgment and Exhibit 29 filed at Dkt. No. 113 are identical to the versions I served to Plaintiff's counsel at 2:09 a.m. on December 11.
- 6. As described in the Declaration of Lauren N. Beck Regarding Exhibits to Dkt. No. 111 (Dkt. No. 116), BlackBerry also discovered that five exhibits attached to the public-redacted version of BlackBerry's Motion for Summary Judgment (Dkt. No. 111) contained material that was inadvertently filed publicly, rather than under seal, and which implicates the privacy interests

of third parties. BlackBerry called the ECF helpdesk, which promptly locked the exhibits. BlackBerry then filed a Motion to Lock Improperly Filed Documents (Dkt. No. 115), requesting that the Court seal the five docket entries in question (Ex. 3 (Dkt. 111-7), Ex. 9 (Dkt. 111-12), Ex. 30 (Dkt. 111-33), Ex. 31 (Dkt. 111-34), and Ex. 34 (Dkt. 111-37)). BlackBerry has since filed revised public-redacted versions of those five exhibits (Dkt. No. 116).

- 7. With this filing, BlackBerry is now submitting revised, under-seal versions of those five exhibits (Exhibits 3, 9, 30, 31, and 34). The revised, under-seal versions of those exhibits reflect the changes described in the Declaration of Lauren N. Beck Regarding Exhibits to Dkt. No. 111 (Dkt. No. 116).
- 8. With this filing, BlackBerry is also submitting a **Supplemental Declaration of Jennifer Bramhill**, which describes the additional material BlackBerry now seeks to seal in Exhibits 3, 9, 30, 31, and 34.
- 9. To consolidate the materials related to BlackBerry's sealing motion and avoid creating confusion on the docket, BlackBerry is now submitting, as one consolidated filing: (1) the revised, under-seal versions of the five exhibits filed at Dkt No. 116, which reflect changes described in the Declaration of Lauren N. Beck Regarding Exhibits to Dkt. No. 111 (Dkt. No. 116); (2) a Supplemental Declaration of Jennifer Bramhill, which describes the additional material BlackBerry now seeks to seal in Exhibits 3, 9, 30, 31, and 34; (3) a Revised Proposed Order, which reflects the additional material BlackBerry now seeks to seal in Exhibits 3, 9, 30, 31, and 34; and (4) the remaining materials that were originally filed at Dkt. Nos. 112 and 113, which are filed without any changes.
- 10. Except for the changes described above, no changes have been made to the content of any of materials included in this filing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 12th day of December, 2025, at Los Angeles, California.

DATED: December 12, 2025		
B111EB: Beccinice1 12, 2023		_
	By:	/s/ Lauren N. Beck
		Lauren N. Beck
	-3-	Case No. 3:24-cv-02002-SK
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